

January 8, 2024

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VIA ECF

The Honorable J. Paul Oetken
United States District Court
40 Foley Square, Room 2101
New York, NY 10007

Re: *Rowena Drennen, et al., and ResCap Liquidating Trust v. Certain Underwriters at Lloyd's, London, et al.*; Case No. 23-cv-03385-JPO

Dear Judge Oetken:

The ResCap Liquidating Trust (the “Trust”) respectfully submits this letter in response to the January 5 Letter Motion for Oral Argument (ECF 188) from Defendants Underwriting Members at Lloyd’s, London and Companies (“Lloyd’s”). The Trust objects to and opposes Lloyd’s belated request for oral argument six months after the parties completed objections briefing. This request is both untimely and unnecessary: the parties’ objections (and responses) are supported by an extensive record below, including eleven motions for summary judgment, transcript from an 8-hour oral argument before the bankruptcy court, the bankruptcy court’s 200+ pages of summary judgment rulings, and thousands of pages of exhibits. This voluminous record – and the decisions included in the bankruptcy court’s Report and Recommendation - were the result of almost nine years of hard-fought litigation leading up to the June 10, 2024 trial date set by the Court last July. Lloyd’s should not be allowed to again delay the adjudication of the Trust’s and Class Plaintiffs’ claims.

All Plaintiffs agree that oral argument is not necessary to resolve the parties’ objections, and we respectfully request the Court deny Lloyd’s request and confirm the present trial date. The Trust is happy to discuss this issue in more detail at the upcoming status conference.

Sincerely,



Vivek Chopra

cc: All Counsel of Record via ECF